

EXHIBIT E

PLAINTIFF'S REFINED WITNESS LIST¹

WITNESS	SUMMARY OF TESTIMONY
Expert	
Boyles, Steve	
Chandler, John	Data analytics; digital and viral marketing strategies and tactics; impact of JLI marketing strategies.
Cutler, David	JUUL sales and youth usage data; regional sales data.
Drumwright, Minette	Marketing strategies and standards of care for JLI & Altria; corporate responsibility; JLI & Altria's role in youth vaping epidemic.
Emery, Sherry	
Grunberg, Neil	Science of nicotine and nicotine addiction; vulnerability of youth to nicotine addiction and tobacco marketing, industry knowledge and motivations regarding youth and tobacco use; public health consensus regarding safeguards necessary to protect youth from nicotine addiction; JUUL's design (including salts and flavoring) and its impact on initiating and sustaining nicotine addiction among youth; rebuttal to defense contentions regarding JUUL's success as a smoking cessation device.
Halpern-Felsher, Bonnie	
Jackler, Robert	
Johnson, Robert (*pending stipulation)	
Lindblom, Eric	
Pratkanis, Anthony	
Prochaska, Judith	The impact of JLI's and Altria's design, marketing, promotion, and sales tactics on youth nicotine usage; JLI and Altria's roles in the youth vaping epidemic; nicotine addiction and associated behaviors; physiological, psychological, and neurological effects of nicotine addiction; general causation; causation of B.B.'s JUUL initiation, nicotine addiction, and associated injuries; symptoms, harm, indicated treatment and damages associated with B.B.'s nicotine addiction and associated injuries; impact of JUUL design and marketing on B.B.'s JUUL initiation; rebuttal to defense contentions, including comparative fault defense.

¹ This chart reflects Plaintiff's "refined witness list," subject to the reservations previously raised with Defendants and the Court. See Doc. 3040. Because the witnesses highlighted in yellow are those most likely to be called in Plaintiff's case-in-chief, Plaintiff provides a summary of the testimony to be given for those witnesses. These summaries are not meant to be an exhaustive list of all potential areas upon which each witness may testify, but rather a shorthand reference for the Court. Plaintiff will not elicit duplicative testimony from multiple witnesses.

WITNESS	SUMMARY OF TESTIMONY
Proctor, Robert	
Ribisl, Kurt	
Shihadeh, Alan	JUUL's design, operation, and performance, and its impact on user behaviors.
Tackett, Randall	
Winickoff, Jonathan	Causation of B.B.'s JUUL initiation, nicotine addiction, and associated injuries; symptoms, harm, and damages associated with B.B.'s nicotine addiction and associated injuries; existence of and cause of B.B.'s physical injuries and symptoms; impact of JUUL design and marketing on B.B.'s JUUL initiation.
Live	
B.B.	B.B.'s JUUL initiation and usage; exposure to and impact of JUUL marketing, design, product placement and product predominance on B.B.'s JUUL initiation, usage, and addiction; B.B.'s injuries and damages caused by JUUL; treatment for alleged injuries and nicotine cessation efforts.
Bain, Robin	B.B.'s JUUL use; B.B.'s injuries and damages caused by JUUL; treatment for alleged injuries and nicotine cessation efforts; impact of B.B.'s addiction and other alleged injuries.
Bowen, Adam	Development of JLI; development of JUUL; JLI's knowledge; JLI's conduct regarding JUUL marketing, sales, promotion, design, and youth protection; acquisition plans; negotiations with Altria.
E.C.	B.B.'s JUUL usage; B.B.'s JUUL usage timeline; observed effects of JUUL usage on B.B.; prevalence of JUUL in B.B.'s community and amongst peers.
Frankel, Zachary	JLI-Altria negotiations.
Hemmat, Heidi	
Monsees, James	Development of JLI; development of JUUL; JLI's knowledge; JLI's conduct regarding JUUL marketing, sales, promotion, design, and youth protection; acquisition plans; JLI-Altria negotiations.
Pritzker, Isaac	JLI-Altria negotiations.
Sweeney, Mimi	Underage attendees at JLI events.
Wakefield, Camesheann	Underage attendees at JLI events.
Deposition	
Asseily, Alexander	"Vaporized" campaign; pre-launch marketing development; tobacco youth-targeted marketing.
Atkins, Ariel	Early development of JUUL, including flavor development; nicotine spike; "pod-popping"; toxicants.
Bain, Troy	B.B.'s JUUL use; B.B.'s injuries and damages caused by

WITNESS	SUMMARY OF TESTIMONY
	JUUL; treatment for alleged injuries and nicotine cessation efforts; impact of B.B.'s addiction and other alleged injuries.
Blaylock, Brian	JLI-Altria negotiations; knowledge of youth use and JUUL's lack of impact on cigarette sales; post-JLI payout conduct.
Cohen, Gal	
Devitre, Dinyar	JLI-Altria negotiations; knowledge of youth use; post-JLI payout conduct.
Dunlap, Scott	Early marketing development; internal concerns regarding youth use; conduct and motivations of JLI investors and leaders.
Edmonson-Taylor, Jessica	Social media influencers; celebrities; sampling; knowledge of youth use.
Fernandez, Pascal	Pre-negotiations investigation by Altria; knowledge of youth use and JUUL's lack of impact on cigarette sales.
Gardner, William	
Garnick, Murray	JLI-Altria negotiations; Altria's knowledge of youth use (including JUUL's lack of impact on cigarette sales); youth appeal of flavors.
Gifford, William	JLI-Altria negotiations; JLI's role in youth nicotine epidemic; post-JLI payout conduct; Altria's business rationales.
Goldman, Tyler	Youth appeal of JLI marketing.
Gould, Ashley	
Harter, Bruce	JLI's youth prevention curriculum; related focus groups.
Henderson, Julie	
Hunter, Jennifer	
Kania, Chelsea	
Latronica, Vincent	
Longest, Kaitlin	Altria's post-JLI payout services to expand and grow JUUL sales
Lunn, Joseph	
Melvin, Matt	Toxicants in JUUL e-liquids and aerosols.
Misra, Manoj	
Morgan McLeod, Katherine	Social media influencers; seeding; sampling; marketing events.
Mumby, Richard	Early JLI marketing; tobacco youth-targeted marketing; development of "Vaporized" campaign; effect of advertising on youth initiation and use.
Murillo, Jose	JLI's responsibility for product safety; public health conclusions re: nicotine; effect of JUUL sales on cigarette sales.

WITNESS	SUMMARY OF TESTIMONY
Myers, Daniel	Nicotine salts; PK study design; risks of JUUL use; youth prevention design features; nicotine spike.
Olin, Christopher	Concerns re: JUUL's health effects and appeal to youth; related conversations with N. Pritzker.
Perfetti, Thomas	Nicotine salt research; consultation work for Adam Bowen.
Pulido, Alfonso	
Richardson, Sarah	JLI marketing code; age-gated mediums; Tobacco 21; knowledge of youth use.
Robbins, Charles ("Bob")	
Romyak, Matthew	JLI-Altria negotiations; Altria's knowledge of youth usage
E.S.	B.B.'s JUUL usage; prevalence of JUUL in B.B.'s community and amongst peers; E.S.'s exposure to JUUL marketing and product placement; impact of JUUL's marketing and design on E.S., which directly impacted B.B.
Troy, Tevi	
Valani, Riaz	JLI-Altria negotiations; JLI knowledge re: youth use; JLI business strategy, including marketing, launch and growth; JLI motivations.
Walker, Nora	Social media marketing; age-gating.
Willard, Howard	Standards of care for tobacco manufacturers; JLI-Altria negotiations; Altria business motivations; Altria's knowledge regarding JUUL and JLI.
Xu, James	
Deposition/Live	
Auguston, Erik	
Bailey, Charlotte	
Brown, Nicholas	Flavor development and characteristics of flavored e-liquids; effect of flavors on youth initiation and use.
Burns, Kevin	
Christensen, Steven	
Crosthwaite, Kevin ("K.C.")	JLI-Altria negotiations and relationship; tobacco youth-targeted marketing; Altria's business motivations and strategy.
Dalton, M.D., Rosanne	Treating pediatrician. B.B.'s care and treatment, diagnosis, nicotine addiction and cessation efforts, family, social and medical history, impact of B.B.'s addiction and associated injuries; symptoms, harm, and damages associated with B.B.'s nicotine addiction and associated injuries, rebut comparative fault defense.
Garvey, Lee	
Hatton, Cole	Development of JUUL; "party mode"; "pod-popping"; nicotine spike; youth prevention design features.

WITNESS	SUMMARY OF TESTIMONY
Kaslow, Jacob	Treatment of B.B.'s alleged pulmonary injuries.
Pritzker, Nicholas	JLI-Altria negotiations; internal knowledge of youth use.
Rouag, Ziad	JLI corporate culture; knowledge of youth use; regulatory matters; JUUL nicotine delivery.
Xing, Chenyue	Scientific development of JUUL and JUUL's salt-based e-liquids; testing/studies of JUUL; youth prevention design features.

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